

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA)
)
 v.) NO. 2:19-CR-00013
)
) CHIEF JUDGE CRENSHAW
GEORGIANNA GIAMPIETRO)

**GOVERNMENT'S MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE TO OBJECTIONS**

COMES NOW the United States of America, by and through the undersigned Assistant United States Attorney, and respectfully requests a short extension of time to respond to the Defendant's Objections to the Presentence Report (D.E. 396.) In her position paper, the defendant makes a number of detailed objections to the offense conduct portion of the presentence report and to the recommended Guidelines calculations.

In support of the government's requested extension, the government advises that counsel is currently in the process of preparing appropriate responses to the defendant's objections but given counsel's schedule demands and the nature of the defendant's claims, counsel needs brief, additional time to complete the review of the pertinent record and to finalize the government's response, to include the submission of relevant authority and factual support for its position. Counsel respectfully requests a short extension from the current due date to May 9, 2022, in which to submit the government's response in this matter. Defense counsel has been contacted regarding the stated request, and he has indicated no objection thereto.

Respectfully Submitted,

MARK H. WILDASIN
United States Attorney
Middle District of Tennessee

By: /s/ Philip H. Wehby
PHILIP H. WEHBY

KATHRYN RISINGER
Assistant United States Attorneys
110 9th Avenue South
Nashville, Tennessee 37203
Phone: (615) 736-5151

/s/ Jennifer E. Levy
JENNIFER E. LEVY
Trial Attorney
Counterterrorism Section
U.S. Department of Justice
950 Pennsylvania Avenue, N.W., Ste. 7600
Washington, D.C. 20530
(202) 514-1092

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2022, I am electronically filing a copy of the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send a Notice of Electronic Filing to counsel of record for the defendant in this case.

/s/ Philip H. Wehby
PHILIP H. WEHBY
Assistant United States Attorney